

### **REMARKS**

The present application includes pending claims 1-26, all of which have been rejected. By this Amendment, claims 1-5, 7-15, 18-19, 21, 23-24 and 26 have been amended, as set forth above.

Claim 8 was objected to because of a minor typographical error. The Applicants have amended claim 8 to correct this minor drafting error.

Claims 1, 2, 4, 6, 7, 8, 10, 12 and 13 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. 2003/0214955 ("Kim"). Claims 16, 17 and 20-26 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. 2004/0133914 ("Smith"). Claims 3, 9 and 14 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kim in view of U.S. 5,956,716 ("Kenner"). Claims 5, 11 and 15 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kim in view of Smith. Claim 18 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Smith in view of Kenner. Claim 19 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Smith in view of U.S. 5,675,647 ("Garneau"). The Applicants respectfully traverse these rejections for at least the following reasons:

The Applicants first turn to the rejection of claims 1, 2, 4, 6, 7, 8, 10, 12 and 13 as being anticipated by Kim. Without conceding that Kim qualifies as prior art under 35 U.S.C. 102(e), the Applicants traverse the rejection as follows:

Claim 1 of the present application recites, in part, "requesting affirmative confirmation using said received address correlation information associated with one or

both of the television display and/or the storage; and storing said affirmative confirmation.”

Kim discloses a network connection apparatus that includes “an address acquisition module capable of acquiring a public IP address of a network management device from a DNS based on a domain name of the network management device of [a] second private network.” *See* Kim at Abstract.

The Office Action cites Kim at Paragraph [0061] as disclosing “requesting affirmative confirmation....” *See* February 21, 2008 Office Action at page 4. This cited portion of Kim states, however, the following:

If the public IP address of the second home gateway 180 is obtained, the first home gateway 110 is connected to the second home gateway and then requests to establish a tunnel (S440). On receiving a response to the request for establishing a tunnel from the second home gateway 180 (S450), the first home gateway 110 sends to the connection-requesting network device 100a a message notifying of the establishment of a tunnel up to the second home gateway 180 (S460).

Kim at [0061]. As shown above, this cited portion of Kim discloses that the gateway 110 requests to establish a tunnel. Note, the request relates to establishment of a tunnel, but not a request for affirmative confirmation. The cited portion next discloses that when a response to the request to establish a tunnel is received, the gateway 110 sends (but there is no mention of any request regarding) a message notifying of the establishment of a tunnel. This cited portion (and the remainder) of Kim does not describe, teach or suggest “requesting affirmative confirmation using said received address correlation information” associated with one or both of the television display

and/or the storage,” as recited in claim 1. Thus, for at least this reason, the Applicants respectfully request reconsideration of the rejection of claim 1 and the claims that depend therefrom.

The Office Action also cites Kim at paragraph [0053], lines 5-7, as disclosing “storing the affirmative confirmation,” as recited in claim 1. However, this portion of Kim discloses the following: “Information necessary for the process of encoding and decoding packets in the encoding part 120 is stored in the memory part 121.” See Kim at [0053]. Notably, this cited portion of Kim merely discloses that information for encoding and decoding packets is stored. It does not describe, teach or suggest, however, “storing said **affirmative confirmation**,” as recited in claim 1. Thus, for at least this additional reason, the Applicants respectfully request reconsideration of the rejection of claim 1 and the claims that depend therefrom.

Independent claim 6 recites, in part, “requesting confirmation using the address correlation information associated with the second media component.” The Applicants respectfully request reconsideration of the rejection of claim 6 and the claims that depend therefrom for at least some of the reasons discussed above.

Independent claim 12 has been amended to recite, in part, “wherein one or more of said television display, said storage and/or said server requests affirmative confirmation using one or both of said first and/or second associated routing addresses.” The Applicants respectfully request reconsideration of the rejection of claim 12 and the claims that depend therefrom for at least some of the reasons discussed above.

The Applicants next turn to the rejection of claims 16, 17 and 20-26 as being anticipated by Smith. The Office Action cites "key server 56" of Smith as the "at least one processor" of claim 16. *See* February 21, 2008 Office Action at page 7. The Office Action also cites "station 52" as the "first device," of claim 16 and media player 12 of user A as the "second device," and media player 12 of user B as the "third device." *See id.* at page 8. However, with respect to the "at least one processor authenticates" portion of claim 16, the Office Action relies on "server 52." *See id.* ("With reference to Fig. 12 and Paragraphs [0065]-[0067], when user B requests media from user A (step 430), user B must also request user A's public key from server 52 (step 440)").

Further, the Office Action cites paragraphs [0065]-0067] of Smith with respect to the "at least one processor authenticates" clause of claim 16. *See id.* at page 8. However, these cited portions of Smith merely indicate that B's public key is used to "encrypt the packet (446)" and that a key is then "sent to user B's system, which uses it own private key to decrypt," but not that the public key is used to "authenticate access information" by a first device when a third device attempts to transfer at least one of media data and service to the second device, as recited in claim 16. For at least these reasons, the Applicants respectfully request reconsideration of the rejection of claim 16, 17 and 20-26 as being anticipated by Smith.

Claims 3, 9 and 14 stand rejected as being unpatentable over Kim in view of U.S. Kenner. Claims 5, 11 and 15 stand rejected as being unpatentable over Kim in view of Smith. Claim 18 stands rejected as being unpatentable over Smith in view of Kenner. Claim 19 stands rejected as being unpatentable over Smith in view of Garneau. The

Applicants respectfully request reconsideration of these claim rejections for at least the reasons discussed above.

In general, the Office Action makes various statements regarding the pending claims and the cited references that are now moot in light of the above. Thus, the Applicants will not address such statements at the present time. The Applicants expressly reserve the right, however, to challenge such statements in the future should the need arise (e.g., if such statements should become relevant by appearing in a future rejection).

The Applicants respectfully request that the outstanding rejections be reconsidered and withdrawn. If the Examiner has any questions or the Applicants can be of any assistance, the Examiner is invited to contact the undersigned attorney for Applicants. The Commissioner is authorized to charge any necessary fees, or credit any overpayment to the Deposit Account of McAndrews, Held & Malloy, Account No. 13-0017.

Respectfully submitted,

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